

REDACTED -
FOR PUBLIC INSPECTION

EX PARTE OR LATE FILED

Anu Seam
Senior Counsel

SBC Telecommunications, Inc
1401 I Street, NW
Suite 400
Washington, DC 20005



RECEIVED

SEP - 9 2003

ORIGINAL

September 9, 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S. W.
Room TWB-204
Washington, DC 20554

**RE: Petition of SBC Communications Inc. for Forbearance from the Prohibition of
Sharing Operating, Installation and Maintenance Functions Under Section
53.203(a) (2) of the Commissions Rules, CC Docket No. 96-149, 98-141**

Dear Ms. Dortch:

In response to the questions raised by the Wireline Competition Bureau staff, SBC is providing further clarification to the SBC Costs of OI&M Restrictions filed on June 16, 2003. Because some of the information contained herein is competitively sensitive proprietary financial data, SBC has filed that information under separate cover as required by this Commission's Protective Order dated June 27, 2003. This filing includes two copies of the redacted version of that document.

Sincerely,

A. Seam

Anu Seam

cc Michelle Carey
William Dever
Pamela Megna
Christi Shewman
Robert Tanner

as requested 072
by the

Clarification of Cost Data

As requested by the Wireline Competition Bureau staff, SBC is filing the following clarifications to the document entitled SBC Costs Of OI&M Restrictions filed on June 16, 2003 (Cost Filing).

1. **Recurring and non-recurring savings:** All the savings identified in the Declaration of Richard Dietz, and further detailed in the Cost Filing dated June 16, 2003 are annual recurring savings, except for the non-recurring savings identified below :
 - a. ASI Operations (Program/Project Management) – savings of **** (proprietary)** as shown on Page 6.
 - b. ASI Operations (Performance Metrics) – savings of **** (proprietary)** as shown on page 7.
 - c. SBCLD Network Planning and Engineering – savings of **** (proprietary)** --- as shown on page 9.
2. **Systems and Software savings:** The amount of **** (proprietary)** as shown on pages 4, 5, and 8 of the Cost Filing was incorrectly labeled as an “annualized expense,” but it represents the “annualized “savings” for systems and software that SBC expects to achieve if it is granted OI&M relief. The estimated percentage of savings in each category on pages 4, 5, and 8 is a further breakdown of this number and reflects the percentage of the **** (proprietary)** that will be saved in each category. Thus, SBC’s estimate of annual savings for systems and software is as follows:
 - a. ASI-DSL, Frame and ATM Systems and Software for Ordering, Circuit Design and Facility Assignment (page 4) – **** (proprietary)**.
 - b. ASI-DSL, Frame and ATM Systems and Software for Provisioning, Installation, Maintenance and Repair (page 5) – **** (proprietary)**.
 - c. SBCLD Systems and Software for Provisioning, Installation, Maintenance and Repair (page 5) – **** (proprietary)**.
 - d. ASI-DSL Systems and Software for Local Field Operations and Dispatch (page 8) – **** (proprietary)**.